

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION-CINCINNATI**

NORCAL TEA PARTY PATRIOTS,
ON BEHALF OF ITSELF, ITS MEMBERS,
AND THE CLASS IT SEEKS TO REPRESENT,

Plaintiff,

v.

THE INTERNAL REVENUE SERVICE, et al.,

Defendants.

Civil Action No. 1:13-cv-00341

Judge Michael R. Barrett

**THE CINCINNATI ENQUIRER, A
DIVISION OF GANNETT GP MEDIA,
INC.'S EXPEDITED MOTION TO UNSEAL
DOCUMENTS 331, 332, 333, 334, AND 344**

The Cincinnati Enquirer, a division of Gannett GP Media, Inc. ("The Enquirer"), respectfully moves this Court to unseal documents number 331, 332, 333, 334, and 344 (the "Sealed Documents"). Documents 331-334 were attached to former Individual Management Defendants, Lois Lerner and Holly Paz's ("Defendants") Motion for Protective Order (Doc. No. 330). Document 344 is Defendants' Reply in Support of Motion for Protective Order.

In Defendants' Memorandum of Law (1) In Support of their Motion to Seal and (2) In Opposition to The Cincinnati Enquirer's Motion to Unseal ("Motion"), the Defendants' write:

For efficiency, Mss. Lerner and Paz incorporate all arguments made and evidence submitted in support of their prior Motion for Protective Order, which the Court granted in relevant part on May 18, 2017. *See* Mot. for a Protective Order and supporting materials, ECF 330, 331, 332, 333, 334; Reply Br. in Supp. of Mot. For Protective Order, ECF 344.

(Doc. No. 392 at p.9.) Defendants then go on to rely on the Sealed Documents throughout the remainder of their Motion.

The Enquirer was not a party to Defendants' Motion for Protective Order and thus did not receive copies of the Sealed Documents. Without an opportunity to review the Sealed Documents, the Enquirer cannot appropriately respond to Defendants' Motion.

The Enquirer respectfully requests that the Court unseal the Sealed Documents for its review. The Enquirer's reply to Defendants' Motion is due on December 14, 2017. Therefore, The Enquirer requests an expedited review of this motion.

Respectfully submitted,

/s/ John C. Greiner
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ATTORNEYS FOR INTERVENOR THE
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DIVISION OF GANNETT GP MEDIA,
INC.

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2017 I electronically filed the foregoing Motion to Unseal with the Clerk of Court by using the CM/ECF system, which will send notice of electronic filing, if applicable, to all parties of record.

/s/ John C. Greiner
John C. Greiner (0005551)